

October 22, 2004

Mary L. Cottrell, Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

RE: D.T.E. 04-91; KeySpan Energy Delivery New England/ Distrigas of  
Massachusetts FVS217.

Dear Secretary Cottrell:

Enclosed for filing please find the Attorney General's First Set of Document and  
Information Requests to the Company. Thank you for your attention to this matter.

Sincerely,

Colleen McConnell  
Assistant Attorney General

cc: Thomas P. O'Neill, Esq. KeySpan Energy Delivery

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

---

Petition of Boston Gas Company,  
d/b/a KeySpan Energy Delivery New England  
For Approval of a Firm Vapor Service Agreement  
with Distrigas of Massachusetts LLC

---

)  
)  
)  
)  
)  
)

D.T.E. 04-91

**ATTORNEY GENERAL'S  
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS**

**INSTRUCTIONS**

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Boston Gas Company, d/b/a KeySpan Energy Delivery New England ("KeySpan" or "Company"), or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of

the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.
13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response to the Attorney General.

16. Unless the Request specifically provides otherwise, the term "Company" refers to KeySpan's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

---

Petition of Boston Gas Company,  
d/b/a KeySpan Energy Delivery New England  
For Approval of a Firm Vapor Service Agreement  
with Distrigas of Massachusetts LLC

---

)  
)  
)  
)  
)  
)

D.T.E. 04-91

**ATTORNEY GENERAL'S  
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS**

- AG-1-1      Please provide copies of all contracts, agreements, amendments, memoranda of understanding and any other documentation of terms, conditions or understandings among the parties (the Company, Distrigas and Prolerized New England) related to the Firm Vapor Service Agreement between Boston Gas Company and Distrigas. Include copies of the agreements referred to in Article IX of the Firm Vapor Service Agreement.
- AG-1-2      Please provide copies of all amendments to the Firm Vapor Service Agreement.
- AG-1-3      Does the Company, Distrigas and/or Prolerized contemplate amending, augmenting, or restructuring any of the agreements referred to in Article IX of the Firm Vapor Service Agreement in the future? If yes, please describe the contemplated changes.
- AG-1-4      Please provide the detail of the costs related to the Company's Everett propane facilities that are currently being recovered through rates. Provide the amounts separately for base rates, CGA and LDAC. Include all supporting documentation (including documents filed in the Company's most recent rate case and CGA filing), calculations, workpapers and assumptions.
- AG-1-5      If the Firm Vapor Service Agreement had been in effect for the 12 months ending October 31, 2004, what would the monthly cost to customers have been? Provide a breakdown of costs by rate element, base rates, CGA and LDAC. Include all supporting documentation, calculations, workpapers and assumptions.
- AG-1-6      What were the actual monthly costs to customers for the services provided by the Everett propane facilities for the 12 months ending October 31, 2004? Provide the breakdown of costs by rate element, base rates, CGA and LDAC. Include all

supporting documentation, calculations, workpapers and assumptions.

- AG-1-7 Refer to Exhibit EDA-1, p. 9. Please provide all documentation supporting the claim that the Everett facility “did not perform as reliably as the Company expected” during January, 2004.
- AG-1-8 What costs will be eliminated from the Company’s CGA and/or LDAC as the result of the Company’s arrangements with Distrigas and Prolerized?
- AG-1-9 How will the Company treat, for ratemaking purposes, the revenues received under the terms of the arrangements with Prolerized and Distrigas?
- AG-1-10 Refer to Exh. EDA-1, p. 8. Please provide copies of all correspondence between the Company and Everett city officials regarding “reconfiguration of the propane facilities.
- AG-1-10 According to the agreements, when will the Everett facilities be decommissioned and the propane tanks removed? Who is responsible for paying for the work? What is the estimated cost of the demolition and related work? Provide all documentation supporting the estimates and provide documentation supporting the scope of work required.
- AG-1-11 What is the book value of the land related to the Everett propane facilities? What is the assessed valuation? If the Company has had the land appraised, provide copies of the most recent appraisals. If the Boston Gas Rover Street property is not equivalent to the Everett propane facilities site, also provide the data requested for the Boston Gas Rover Street property.
- AG-1-12 Please provide a map of the Everett site that shows the Distrigas site, the Prolerized site and the Mystic generating site.
- AG-1-13 Please describe the facilities that will be on the Company’s Everett site (Boston Gas Rover Street property) after the decommissioning and demolition during the term of the lease with Prolerized. What is the Company’s plan for the use of the site at the end of the agreement with Prolerized?

Dated: October 22, 2004